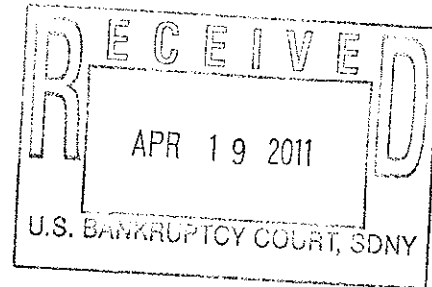


Lorin W. Tate
6 Victoria Crossing Ct.
Gaithersburg, MD 20877
Telephone: (202) 460-1473
Facsimile:

Pro Se



UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
In re:

MOTORS LIQUIDATION COMPANY, *et al.*,
f/k/a General Motors Corp., et al.

Debtors

:
:
: Chapter 11 Case No.
: 09-50026 (REG)

:
:
: (Jointly Administered)
:
:-----X

RESPONSE TO NOTICE OF DEBTOR'S OBJECTION TO ADMINISTRATIVE PROOF OF CLAIM
NO. 70908 FILED BY LORIN W. TATE

TO THE HONORABLE ROBERT E. GERBER,
UNITED STATES BANKRUPTCY JUDGE:

Lorin W. Tate, pro se, hereby files this response to Debtor's Objection to Administrative Proof of Claim No. 70908 Filed By Lorin W. Tate. In response I, Lorin W. Tate, respectfully represent as follows:

1. I rendered services to the Debtors pursuant to a contract signed on August 2007 between myself and General Motors Corporation and GMAC ("GM"), this contract was repeatedly extended through October 15, 2010. I performed services to recover over 8,000 assets listed on public databases, held in 51 jurisdictions in the US and Canada (see attachment A for list of jurisdictions). Pursuant to our contract, GM was to pay me my fee within 60 days upon receipt of the assets. Moreover, I received assurances I would be paid in full after the bankruptcy proceedings were initiated.

A copy of the contract and an email (dated Oct. 28, 2009) from GM providing written assurance of payment were submitted with the original claim.

2. As evidence that the services were rendered, I have provided a list of the 8,000 claims to recover assets that I filed with my administrative expense claim, these assets were identified in my contract and used as a working document with GM during the time I was recovering these assets. In addition, I have provided a statement that these claims are no longer listed as unrecovered assets on the public databases, which can be verified by looking on the public database under the control of the Custodians of the 51 jurisdictions, which was also submitted in my claim. Since the assets are no long listed as unclaimed assets, the there is a strong presumption that the assets have been returned to their owner, GM and it's affiliates.
3. Approximately \$27,600,000 worth of these assets are no longer listed as unclaimed assets. My fee for the recovery of these assets is \$2,208,000. I have been paid by GM a total of \$65,656.44, however, a balance of \$2,142,343 is outstanding.
4. Debtor's objection to my claim revolves around whether the funds were received and, if so, the amount of the actual received funds. Pursuant to our agreement, GM was to pay me upon their *receipt* of funds, and since I do not have access to their bank records, I have attached herewith a set of Interrogatories, which have been sent to Debtor to ascertain whether these approximately 8,000 assets have been received.
5. Debtor claims that I have failed to supply sufficient facts with supporting documentation to establish (a) an expense arises out of a transaction between the creditor and the debtor after the debtor has commenced its bankruptcy case, and (b) the consideration supporting the claimant's right to payment was both supplied and beneficial to the postpetition debtor in the operation of its business in bankruptcy. In response to this, I had submitted with my original claim an e-mail from Mr. Dustin Suppes of GM dated October 28, 2009 which is evidence that (a) services were rendered, and GM desired them to be rendered, after the bankruptcy case commenced and (b) GM regarded my services as beneficial promising full payment of fees despite the bankruptcy proceedings.

6. In the spirit of section 547 of the Bankruptcy Code, 11 U.S.C. § 547, my services helped to maximize the size of the debtor's estate by recovery of receivables (see above referenced email dated October 28, 2009). However, I am not privy to GM's accounts receivables to confirm whether the amounts were received from the 51 Jurisdictions. Since the Debtor has contested the amounts owed in their objection to my claim, I need to obtain evidence - which is solely in Debtor's possession. As an independent contractor with limited resources, who has provided valuable services to the Debtor, I call your attention to *In re Ames Department Stores Inc.*, No. 07-1326-bk, 2009 WL 2972510 (2d Cir. Sept. 18, 2009) which emphasized the higher priority given to requests for administrative expenses so as to not frustrate services being provided to debtors in Bankruptcy, I request you allow me the ability to obtain the necessary evidence, which is solely in Debtor possession, to present the facts that Debtor is citing as lacking in my claim before making a decision regarding my claim. I request you order the Debtor, pursuant to Rule 7033 of the Federal Rules of Bankruptcy Procedure, to answer the attached interrogatories prior to a hearing on my claim.

Respectfully submitted,

Lorin W. Tate
6 Victoria Crossing Ct.
Gaithersburg, MD 20877
Telephone/Facsimile:
(202) 460-1473

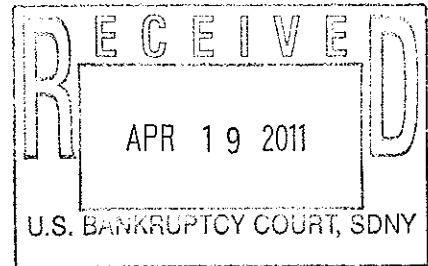
NOTICE

I hereby certify that notice of this Motion has been provided to Debtors, including the Master Service List pursuant to the **FIFTH AMENDED ORDER PURSUANT TO 11 U.S.C. § 105(a) AND FED. R. BANKR. P. 1015(c) AND 9007 ESTABLISHING NOTICE AND CASE MANAGEMENT PROCEDURES**. Further please be advised that I contacted Mr. David Hick, who was identified to me as the Administrator for GM and has been my primary point of contact regarding these proceedings, in an attempt to reach an agreement regarding the subject of the foregoing Motion. No response has been forthcoming at the time of this filing.

Lorin W. Tate
6 Victoria Crossing Ct.
Gaithersburg, MD 20877
Telephone/Facsimile:
(202) 460-1473

Lorin W. Tate
6 Victoria Crossing Ct.
Gaithersburg, MD 20877
Telephone: (202) 460-1473
Facsimile:

Pro Se



UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

In re:

**MOTORS LIQUIDATION COMPANY, et al.,
f/k/a General Motors Corp., et al.**

Debtors

Chapter 11 Case No.
09-50026 (REG)

(Jointly Administered)

**FIRST SET OF INTERROGATORIES TO DEBTOR PURSUANT TO CLAIM NO. 70908
FILED BY LORIN W. TATE**

Lorin W. Tate, Creditor, request that Debtors answer under oath, in accordance with Bankruptcy Code 7033, the following interrogatories to be answered on or before the 19th day of May 2011 to the undersigned.

Instructions

A. Each Interrogatory is to be answered fully on the basis of information, which is in your possession.

B. In each of your answers to these Interrogatories, you are requested to provide not only information as is in your possession, but also information as is reasonably available. In the event that you are able to provide only part of the information called for by any particular Interrogatory, please provide all the information you are able to provide and state the reason for your inability to provide the remainder.

C. If you object to or otherwise decline to answer any portion of an Interrogatory, please provide all information called for by that portion of the Interrogatory to which you do not object or to which you do not decline to answer. For those portions of

an Interrogatory to which you object or to which you do not decline to answer, state the reason for such objection or declination.

D. Every Interrogatory herein shall be deemed a continuing interrogatory and information in addition to or in any way inconsistent with your initial answer to such Interrogatory.

DEFINITION OF TERMS

As used herein, the following terms shall have the following meanings:

A. The words "Debtor," and "Debtors" refer all debtors in this Chapter 11 Case No 09-50026 (REG).

B. "Document" means any written, recorded or graphic material, however produced or reproduced.

C. The word "identify" when used with respect to a document means to state the nature and substance of the writing with sufficient particularity to enable the document to be identified, the date or approximate date on which the writing was prepared, the identity of each person who wrote, signed or otherwise participated in the preparation of the writing, and the identity of the person having current custody of the writing.

D. The words "Relevant Period" means the period October 2008 to present

E. The words "Jurisdiction" or "Jurisdictions" mean these entities:

Alaska Department of Revenue Tax Division
Unclaimed Property Section
PO Box 110420
Juneau, AK 99811-0420

Arkansas State Auditor
Unclaimed Property Division
PO Box 251920
Little Rock AR 72225-1920

Alberta CANADA
Tax and Revenue Administration
Alberta Finance and Enterprise
9811 - 109 Street
Edmonton AB T5K 2L5
Canada

Alabama Unclaimed Property Division
PO Box 302520
Montgomery, AL 36130-2520

Arizona Department of Revenue
Unclaimed Property Unit
P.O. Box 29026
Phoenix, AZ 85038-9026

Bank of CANADA
Unclaimed Balances Services
Bank of CANADA
234 Wellington Street,
Ottawa Ontario K1A 0G9
Canada

California State Controller
Unclaimed Property Division
Mail Stop 30
P.O. Box 942850
Sacramento, CA 94250-5873

County of Kern CA
1115 Truxtun Avenue
Bakersfield CA 93301

County of Los Angeles CA
Department of Auditor-Controller
500 West Temple Street, Room 502
Los Angeles, CA 90012
ATTN: Claim Review Unit

County of Nevada CA
950 Maidu Avenue
Nevada City, CA. 95959

County of Sacramento
Department of Auditor-Controller
700 H Street, Room 3650
Sacramento, CA 95814
ATTN: Warrant Accounting Unit

San Diego City Auditor & Comptroller
202 C Street, MS-6A
San Diego, CA 92101

CO Department of the Treasury
Unclaimed Property Division
1580 Logan Street, Suite 500
Denver, CO 80203

Connecticut Office of the Treasurer
Unclaimed Property Division
PO Box 5065
Hartford CT 06106

DC Office of Finance & Treasury
Unclaimed Property Unit
1275 K Street, NW
Suite 500B
Washington, DC 20005

DELAWARE STATE ESCHEATOR
P.O. BOX 962049
BOSTON, MA 02196-2049

Federal Deposit Insurance Corporation
1601 Bryan Street, Office - 32138
Dallas, TX 75210

Florida Department of Financial Services
Bureau of Unclaimed Property
Post Office Box 1990
Tallahassee, FL 32302-1990

Georgia Department of Revenue
Local Government Services
Unclaimed Property Program
4245 International Parkway, Suite A
Hapeville, GA 30354-3918

State of Hawaii
Department of Budget and Finance
Unclaimed Property Program
P.O. Box 150
Honolulu, HI 96810

Kansas State Treasurer
Unclaimed Property Division
900 Jackson Suite 201
Topeka, KS 66612-1235

Office of State Treasurer
Unclaimed Property
1050 US Highway 127 South, Suite 100
Frankfort, KY 40601

Iowa State Treasurer
Michael L. Fitzgerald, State Treasurer
The Great Iowa Treasure Hunt
Lucas State Office Building
321 East 12th Street
Des Moines, IA 50319

Idaho State Tax Commission
Unclaimed Property Section
P.O. BOX 70012
Boise, ID 83707-0112

Office of State Treasurer
Unclaimed Property Division
PO Box 19495
Springfield, IL 62794-9495

Indiana Attorney General's Office
Office of the Attorney General
Unclaimed Property Division
P.O. Box 2504
Greenwood, IN 46142

Louisiana State Treasurer
Louisiana Department of the Treasury
Unclaimed Property Division
P.O. Box 91010
Baton Rouge, LA 70821

State of Massachusetts
Abandoned Property Division
1 Ashburton Place, 12th Floor
Boston, MA 02108

Comptroller of Maryland
Compliance Division, Unclaimed Property Unit
301 West Preston Street, Room 310
Baltimore, MD 21201-2383

State of Michigan
Unclaimed Property Division
Michigan Department of Treasury
P.O. Box 30756
Lansing MI 48909

Missouri State Treasurer
Unclaimed Property Division
P.O. Box 1004
Jefferson City, MO 65102

Montana Department of Revenue
Unclaimed Property
P.O. Box 5805
Helena, MT 59604-5805

Nebraska State Treasurer
Unclaimed Property Division
5800 Cornhusker Highway, Building 2, Suite 4
Lincoln, NE 68507

New Jersey Department of the Treasury
Unclaimed Property
P.O. Box 214
Trenton, NJ 08695-0214

U.S. Bankruptcy Court - Northern District of Illinois
United States Trustee
227 W. Monroe, Suite 3350
Chicago IL 60604

Nevada State Treasurer
Unclaimed Property Division
555 E Washington Avenue
Suite 4200
Las Vegas, NV 89101-1070

State of Ohio
77 S. High Street
20th Floor
Columbus, OH 43215-6108

Oregon Department of State Lands
Unclaimed Property Division
775 Summer Street NE Suite 100
Salem, OR 97301-1279

Pennsylvania State Treasurer
Unclaimed Property Bureau
P.O. Box 1837
Harrisburg, PA 17105-1837
Attn: Research Department

Maine Treasurer's Office
Unclaimed Property Division
39 State House Station
111 Sewall Street, 3rd FL
Augusta, ME 04333-0039

Minnesota Department of Commerce
Unclaimed Property Division
85 7th Place East, Suite 600
St. Paul, MN 55101-3165

Mississippi Treasury Department
Treasury Department
Unclaimed Property Division
P.O. Box 138
Jackson, MS 39205-0138

North Carolina State Treasurer
Unclaimed / Escheats Division
325 N Salisbury Street
Raleigh, NC 27603-1385

New Hampshire Treasury Department
Unclaimed Property Division
25 Capitol Street, Room 205
Concord, NH 03301

New Mexico Taxation & Revenue Departm
Unclaimed Property Division
P.O. Box 25123
Santa Fe, NM 87504-5123

U.S. Bankruptcy Court - Northern District of Illinois
Mr. Kenneth S. Gardner, Clerk
Attention: Financial Administrator
219 S. Dearborn Street
Chicago, IL 60604

New York State Comptroller
Unclaimed Funds
Office of the State Comptroller
110 State Street
Albany NY 12236

Oklahoma State Treasurer's Office
Unclaimed Property Division
4545 North Lincoln Boulevard, Suite 106
Oklahoma City, OK 73105-3413

Oregon Department of Revenue
Finance Section
955 Center Street NE
Salem OR 97301-2555

Revenu Quebec
Direction général des biens non réclamés
500, boulevard René-Lévesque Ouest, bureau 10.00
Montreal PQ H2Z 1W7
Canada

PUERTO RICO
Office of the Commissioner
of Financial Institutions
Unclaimed Property Division
PO BOX 11855
SAN JUAN 00910-3855
Puerto Rico

Rhode Island Department of Treasury
Unclaimed Property Division
P.O. Box 1435
Providence, RI 02901-1435

State of South Carolina
State Treasurer's Office
Unclaimed Property Program
PO Box 11778
Columbia, SC 29211

South Carolina Retirement System
South Carolina Retirement Systems
Fontaine Business Center
202 Arbor Lake Drive
Columbia, SC 29223

South Dakota Office of the State Treasurer
Vernon L. Larson
500 East Capitol Ave.
Pierre, SD 57501-5070

Tennessee Treasury Department
Unclaimed Property Division
Andrew Jackson Building, 9th Floor
500 Deaderick Street
Nashville, TN 37243-0242

Texas Comptroller of Public Accounts
Unclaimed Property Claims Section
P.O. Box 12019
Austin, TX 78711-2019

USBC ALABAMA -- Middle
Frank M. Johnson, Jr. Federal
Courthouse Annex
One Church Street
Montgomery, AL 36104

USBC ALASKA
Old Federal Bldg, Suite 138
605 West Fourth Avenue
Anchorage, AK 99501-2248

USBC ARIZONA
United States Courthouse, Suite 101
230 North First Avenue
Phoenix, AZ 85003

USBC ARKANSAS
Old United States Post Office
and Courthouse
300 West Second Street
Little Rock, AR 72201

USBC CALIFORNIA -- Central
Edward R. Roybal Federal Bldg
and Courthouse
255 East Temple Street
Los Angeles, CA 90012-3332

USBC CALIFORNIA -- Eastern
3-200 Robert T. Matsui
United States Courthouse
501 I Street
Sacramento, CA 95814-7300

USBC CALIFORNIA -- Northern
United States Courthouse,
19th Floor
235 Pine Street
San Francisco, CA 94104-2716

USBC CALIFORNIA -- Southern
Southern District of California
Jacob Weinberger United States Courthouse
325 West F Street
San Diego, CA 92101 -- 6998

U.S. Bankruptcy Court
Attn: Finance Dept.
U.S. Custom House
721 19th Street
Denver CO 80202

USBC CONNECTICUT
Abraham Ribicoff Federal Bldg and
United States Courthouse
450 Main Street
Hartford, CT 06103-3022

USBC Delaware
U. S. Bankruptcy Court
District of Delaware
824 North Market Street, 3rd Floor
Wilmington, DE 19801-3024

USBC DISTRICT of COLUMBIA
1225 E. Barrett Prettyman
United States Courthouse
333 Constitution Avenue, N.W., Suite 1825
Washington, DC 20001

USBC FLORIDA -- Middle
727 Sam M. Gibbons
United States Courthouse
801 North Florida Avenue
Tampa, FL 33602-3849

USBC FLORIDA -- Northern
United States Courthouse, Suite 100
110 East Park Avenue
Tallahassee, FL 32301

USBC FLORIDA -- Southern
1401 Claude Pepper Federal Bldg
51 Southwest First Avenue
Miami, FL 33130

USBC HAWAII
UNITED STATES BANKRUPTCY COURT
DISTRICT OF HAWAII
1132 Bishop Street, Suite 250L
Honolulu, HI 96813

USBC INDIANA - N
Robert K. Rodibaugh
United States Courthouse
401 South Michigan Street
South Bend, IN 46601

USBC IOWA - Northern
425 Second Street S.E., Suite 800
Cedar Rapids, IA 52401-1816

USBC KENTUCKY - W
United States Bankruptcy Court
Western District of Kentucky
601 West Broadway
Louisville KY 40202

Louisiana Middle Bankruptcy Court
United States Courthouse and Federal Building
707 Florida Street, Suite 119
Baton Rouge LA 70801

Maine Bankruptcy Court
J.B. Brown Block
537 Congress Street, 2nd Floor
Portland ME 04101-3306

USBC MICHIGAN - Eastern
Suite 2100
211 West Fort Street
Detroit, MI 48226

Nebraska Bankruptcy Court
Roman L. Hruska United States Courthouse
111 South 18th Plaza, Suite 1125
Omaha NE 68102

USBC NEW JERSEY
3017 Martin Luther King, Jr.
Federal Bldg and U.S. Courthouse
50 Walnut Street
Newark, NJ 07102

USBC NEW YORK - E
United States Post Office and
Courthouse, Suite 1595
271 Cadman Plaza East
Brooklyn, NY 11201-1800

USBC NEW YORK - S
615-3 Alexander Hamilton
Custom House
One Bowling Green
New York, NY 10004-1408

USBC OHIO - N
Carl B. Stokes United States
Court House
801 West Superior Avenue
Cleveland, OH 44113

USBC IDAHO
U.S. Courthouse and Federal Building
550 west Fort Street, Suite 400
Boise, ID 83724

USBC INDIANA - S
Birch Bayh Federal Bldg and
United States Courthouse
46 East Ohio Street
Indianapolis, IN 46204

USBC KENTUCKY - E
Community Trust Bldg, Suite 200
100 East Vine Street
Lexington, KY 40507-1442

Louisiana Eastern Bankruptcy Court
Hale Boggs Federal Building
United States Courthouse
500 Poydras Street, Suite B-601
New Orleans LA 70130

Louisiana Western Bankruptcy Court
United States Court House
300 Fannin Street, Suite 2201
Shreveport LA 71101

USBC MARYLAND
United States Bankruptcy Court - Maryland
United States Courthouse, Suite 300
6500 Cherrywood Lane
Greenbelt, MD 20770

USBC MICHIGAN - Western
Room 200
One Division Street, N.
Grand Rapids, MI 49503-3132

USBC NEW HAMPSHIRE
Suite 1001
1000 Elm Street
Manchester, NH 03101-1708

USBC New Mexico
PO Box 546
Albuquerque, NM 87103-0546

USBC NEW YORK - N
330 James T. Foley
United States Courthouse
445 Broadway
Albany, NY 12207

USBC NEW YORK - W
Olympic Towers
300 Pearl St. Suite 250
Buffalo, NY 14202

USBC OHIO - S
Atrium Two, Suite 800
221 East Fourth Street
Cincinnati, OH 45202

USBC OREGON
Congress Center, Suite 700
1001 Southwest Fifth Avenue
Portland, OR 97204-1145

USBC RHODE ISLAND
The Federal Center, 6th Floor
380 Westminster Mall
Providence, RI 02903-3246

USBC TEXAS - Southern
PO Box 61010
Houston TX 77002-2600

Texas Western Bankruptcy Court
Hipolito F. Garcia Federal Building and
United States Courthouse
615 East Houston Street, Room 597
San Antonio TX 78205

USBC VIRGINIA - Eastern Alexandria
U.S. Bankruptcy Court
200 S. Washington St.
Alexandria, VA 22314-5405

USBC WASHINGTON - E
Eastern District of Washington
PO Box 2164
Spokane, WA 99210

Wisconsin Eastern District Court
United States Courthouse and Federal Building
517 East Wisconsin Avenue, Room 362
Milwaukee WI 53202

USBC WYOMING
Joseph C. O'Mahoney Federal Bldg.
Suite 6004
2120 Capitol Avenue
Cheyenne, WY 82001

Virginia Department of Treasury
Unclaimed Property Division
P.O. Box 2478
Richmond, VA 23218-247
Vermont Office of the State Treasurer
Unclaimed Property Division
109 State Street, 4th Floor
Montpelier, VT 05609-6901

Wisconsin State Treasurer's Office
Unclaimed Property Division
P.O. Box 2114
Madison, WI 53701-2114

Wyoming Office of the State Treasurer
Unclaimed Property Division
2515 Warren Avenue, Suite 502
Cheyenne, WY 82002

USBC Pennsylvania
Robert N.C. Nix, Sr. Federal Bldg
900 Market Street, Suite 400
Philadelphia, PA 19107-4299

USBC TEXAS - Eastern
Office of the United States Attorney
Eastern District of Texas
Attn: Unclaimed Funds Requests
350 Magnolia Avenue, Suite 150
Beaumont, TX 77701-2248

Texas Northern Bankruptcy Court
Earle Cabell Federal Building and
United States Courthouse
1100 Commerce Street, Room 1254
Dallas TX 75242

USBC UTAH
Frank E. Moss
United States Courthouse
350 South Main Street
Salt Lake City, UT 84101-8410

USBC VIRGINIA - W
210 Church Avenue SW
Room 200
Roanoke, VA 24011

USBC WASHINGTON - W
Union Station
1717 Pacific Avenue
Suite 2100
Tacoma, WA 98402-3233

USBC WISCONSIN - W
Robert W. Kastenmeier United States Courthouse
120 North Henry Street, Room 320
Madison WI 53703-2559

State of Utah
Treasurer's Office
Unclaimed Property Division
341 South Main Street, 5th Floor
Salt Lake City, Utah 84111

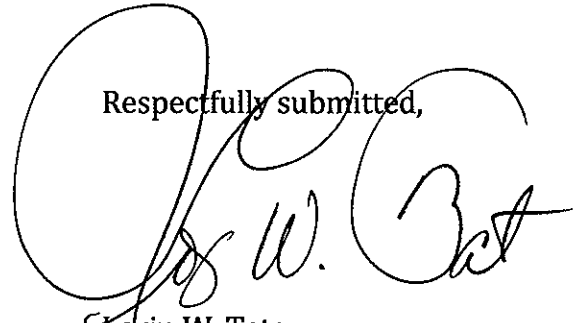
County of Fairfax VA
12000 Government Center Parkway
Suite 214
Fairfax, VA 22035
Washington Department of Revenue
Department of Revenue
Unclaimed Property Section
PO Box 47477
Olympia, WA 98504-7477

West Virginia Office of State Treasurer
One Players Club Drive
Charleston, WV 25311

1. Identify and specify the subject matter of any remittances, checks, warrants, payment voucher, payment stubs, draft, or any other financial document pertaining to the disbursement of funds from the Jurisdictions for the benefit of Debtors during the Relevant Period.
2. Identify correspondence related in any way to asset recovery or unclaimed assets from the Jurisdictions during the Relevant Period, including but not limited to: Notice of Order for Payment of Unclaimed Funds, Order on Withdrawal, Order Granting Motion for Payment of Unclaimed Funds, or other Orders, excluding any Order pursuant to this current proceeding, i.e. this Chapter 11 Case No. 09-50026 (REG)
3. Identify any and all Bank Account Statements and Accounting Ledgers of Debtor, which contain assets received from the Jurisdictions during the Relevant Period.
4. Identify emails, correspondence, documents, recordings of conversations, including but not limited to meetings, conferences, discussions, phone calls with or concerning Mr. Lorin W. Tate during the Relevant Period.
5. Identify all persons answering or supplying information used in answering these interrogatories.
6. State the name, address, and business telephone number of each person with personal knowledge regarding the facts and circumstances surrounding the happenings of the occurrences referred in Claim No. 70908 filed by Lorin W. Tate pursuant to this Chapter 11 Case No. 09-50026 (REG).
7. State and describe in detail all evidence including documents, affidavits and/or statements pursuant to this Claim No. 70908 you intend to rely, or submit at the hearing.

8. Provide copies of any documents referred to or relied upon in your answers to these interrogatories.

Respectfully submitted,



Lorin W. Tate
6 Victoria Crossing Ct.
Gaithersburg, MD 20877
Telephone/Facsimile:
(202) 460-1473

NOTICE

I hereby certify that notice of this Motion has been provided to Debtors, including the Master Service List pursuant to the **FIFTH AMENDED ORDER PURSUANT TO 11 U.S.C. § 105(a) AND FED. R. BANKR. P. 1015(c) AND 9007 ESTABLISHING NOTICE AND CASE MANAGEMENT PROCEDURES**. Further please be advised that I contacted Mr. David Hick, who was identified to me as the Administrator for GM and has been my primary point of contact regarding these proceedings, in an attempt to reach an agreement regarding the subject of the foregoing Motion. No response has been forthcoming at the time of this filing.

Lorin W. Tate
6 Victoria Crossing Ct.
Gaithersburg, MD 20877
Telephone/Facsimile:
(202) 460-1473